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July 13, 2016

Via ECF

Honorable Peter G. Sheridan, U.S.D.J.
U.S. District Court
District of New Jersey
Clarkson S. Fisher Building
& US Courthouse
402 East State Street

Re: *Noreen Sussino v. Work Out World, Inc.*
Civil Action No.: 3:15-cv-05881(PGS)(TJB)

Dear Judge Sheridan:

This firm is counsel to Defendant, Work Out World, Inc. ("WOW") in connection with the above-referenced matter. Further to Your Chamber's direction, we again enclose herein a Final Judgment and Stipulated Permanent Injunction for consideration and execution by Your Honor. These are submitted in accord with binding precedent from the United States Supreme Court requiring that Defendant must both extend an offer and tender payment to comply with Fed. R. Civ. P. 68. *See Campbell-Ewald Co. v. Gomez*, 136 S. Ct. 663 (2016); *Genesis Healthcare Corp. v. Symczyk*, 133 S. Ct. 1523 (2013). Pursuant to the Local Rules, the enclosed Orders also are required to permit Defendant to deposit the funds with the Court.

We are available to discuss this, or any other matter, at the Court's convenience.

Respectfully submitted,

Joshua S. Bauchner

JSB/cs

Enclosures

cc: Ari H. Marcus, Esq. (via ECF)